



2. I make this declaration in support of Defendants’<sup>1</sup> Motion for Leave to File Document Out of Time.

3. On Friday, June 24, 2022, the Court ordered [DE 102], Defendants to respond to Plaintiffs’ Motion for Entry of Protective Order [DE 101] on or before 5:00 p.m. CDT, Monday, June 27, 2022.

4. Upon receiving the Court’s Order, counsel for PPFA immediately began working on Defendants’ Opposition to Plaintiffs’ Motion. That work continued throughout the weekend and into Monday.

5. Based on the Court’s prior order [DE 12], Defendants redacted a portion of the publicly filed copy of their Opposition [DE 103] in order to preserve the Relator’s anonymity. Defendants were prepared to timely file the Opposition, but technical issues arose in the process of confirming that the redactions applied to the to-be-filed document were retained during the conversion to PDF/A format. Defendants worked diligently to obtain that confirmation and filed within a few minutes thereafter.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on June 28, 2022 in Los Angeles, California.

/s/ Leah Godesky  
Leah Godesky

---

<sup>1</sup> This declaration refers to Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”), together with PPFA, as “Defendants.”